

UNITED STATES DISTRICT COURT
FOR THE
EASTERN DISTRICT OF NORTH CAROLINA

)
DONNA R. SANTIFORT,)
Plaintiff,)
)
v.)
)
SUE GUY, in her personal capacity; LEE)
SMITH, in his personal capacity; JOE)
GURLEY, in his personal capacity; and)
STEVE KEEN, in his personal capacity; and)
COUNTY OF WAYNE, NORTH)
CAROLINA;)
Defendants.)
)

Civil Action No. _____

COMPLAINT

NOW COMES Plaintiff Donna R. Santifort, by and through the undersigned counsel, complaining of the Defendants and saying that:

1. Plaintiff Donna R. Santifort (“Santifort”) is a citizen and resident of Lenoir County, North Carolina.
2. Defendant County of Wayne, North Carolina (“the County”) is a local government entity, which has jurisdiction in Wayne County, North Carolina, and who employed Santifort during the time period relevant to this Complaint.
3. Defendant Sue Guy (“Guy”) is the former Human Resources Manager of the County’s Office of Emergency Medical Services (“OEMS”). Guy is, upon information and belief, a citizen and resident of Duplin County, North Carolina and is under no legal disability.
4. Defendant Lee Smith (“Smith”) is the former County Manager for the County and is, upon information and belief, a citizen and resident of Chatham County, Georgia and is under no legal disability.
5. Defendant Joe Gurley (“Gurley”) is a former employee of the County and is now a County Commissioner for the County who, upon information and belief, a citizen and resident of Wayne County, North Carolina and is under no legal disability.